

## Remarks

In the present response, claims 7, 11, 22, 30 and 35-50 are presented for examination.

### **I. Claims Rejection: 35 USC § 102(e)**

Claim 51 is rejected under 35 USC § 102(e) as being anticipated by USPN 7,054,965 (Bell). This rejection is moot since claim 51 is canceled.

### **II. Claims Rejection: 35 USC § 103(a)**

Claim 11 is rejected under 35 USC § 103(a) as being anticipated unpatentable over USPN 5,689,654 (Kikinis). For at least the following reasons, Applicants respectfully traverse this rejection.

Claim 11 recites numerous limitations that are not taught or suggested in Kikinis. By way of example, claim 11 recites (emphasis added):

interface elements are exposed on the externally accessible side  
**for controlling functions** of the multi-functional device (1) when  
the multi-functional device is inserted into the internal device bay  
and (2) when the multi-functional device is removed from the  
internal device bay; and

the interface elements comprise at least one of a volume  
control dial, a headphone jack and a tuner knob.

Nowhere does Kikinis teach or suggest these recitations. The Office Action cites FIGS. 5, 22, and 23 of Kikinis. Applicants respectfully disagree. FIG. 5 of Kikinis shows a PDA 10 that is docked in a notebook computer 172. Kikinis does not teach or suggest that the PDA 10 has interface elements exposed on an externally accessible side for controlling functions of the PDA 10 when the PDA 10 is inserted into the notebook computer 172 and when the PDA 10 is removed from the bay of the notebook computer 172.

FIG. 22 of Kikinis shows a notebook computer 1011 (see FIG. 21A) having a plurality of modules or bays (1019, 1021, 1023, etc.). Kikinis does not teach or suggest that the PDA that inserts into the notebook 1011 of FIG. 22 has interface elements exposed on an externally accessible side for controlling functions of the PDA when the PDA is inserted into the notebook computer 1011 and when the PDA is removed from the bay of the notebook computer 1011.

FIG. 23 of Kikinis shows a function module 1061 having an eject button 1079 on a front face 1077 (see 21: 53-57). The Office Action also argues that this front face includes LEDs. Nowhere does Kikinis teach or suggest that this front face include at least one of a volume control dial, a headphone jack and a tuner knob.

For at least these reasons, claim 11 is allowable over Kikinis.

### **III. Claims Rejection: 35 USC § 103(a)**

Claims 7, 22, 30, 35-38 are rejected under 35 USC § 102(b) as being unpatentable over Kikinis in view of Bell. For at least the following reasons, these rejections are traversed.

#### **Claim 7**

Independent claim 7 recites numerous recitations that are not taught or suggested in Kikinis in view of Bell. For example, claim 7 recites “the multi-functional device comprises at least one of a still image camera, a video camera, a video recorder, a digital camcorder, a television, and a radio.” The Office Action cites col. 6 and Figs. 4, 5A, and 5D in Bell for allegedly teaching a camera to capture images. Applicants respectfully traverse.

Columns 5 and 6 in Bell discuss prior art devices and problems with these devices. Column 6 does mention media readers such as “digital phones, pagers, digital cameras, tape players, CD players, ...” (see Bell at 6: 12-14). These devices, however, are mentioned for a discussion of prior art, not embodiments of the PDA taught in Bell. Figs. 5A and 5D in Bell show different modules for a core component. None of the modules are a still image camera, a video camera, a video recorder, a digital camcorder, a television, or a radio that are inserted into an internal bay of a computer.

For at least these reasons, independent claim 7 is allowable over Kikinis in view of Bell.

**Claim 22**

Independent claim 22 recites numerous recitations that are not taught or suggested in Kikinis in view of Bell. For example, claim 22 recites “at least one of a still image capturing device, a video image capturing device, a television and a radio.” The Office Action cites Figs. 4, 5A, and 5D in Bell for allegedly teaching a video capture device. Applicants respectfully traverse.

Figs. 5A and 5D in Bell show different modules for a core component. None of the modules are a still image capturing device, a video image capturing device, a television or a radio that are inserted into an internal bay of a computer.

For at least these reasons, independent claim 22 is allowable over Kikinis in view of Bell.

**Claim 30**

Independent claim 30 recites numerous recitations that are not taught or suggested in Kikinis in view of Bell. For example, claim 30 recites “the multi-functional device comprises at least one device for capturing digital still images, digital video, a television, and a radio.” The Office Action cites column 6, lines 5-18 of Bell for allegedly teaching a tape player. This rejection is moot since claim 30 does not recite a tape player.

For at least these reasons, independent claim 30 is allowable over Kikinis in view of Bell.

**IV. Claims Rejection: 35 USC § 103(a)**

Claims 35-38 are rejected under 35 USC § 103(a) as being unpatentable over Kikinis in view of Bell and USPN 6,914,594 (Chuang). For at least the following reasons, these rejections are traversed.

### **Claim 35**

Independent claim 35 recites numerous recitations that are not taught or suggested in Kikinis in view of Bell and Chuang. As one example, claim 35 recites “a camera insertable in and **partially fully enclosed within** the internal device bay” of a computer (emphasis added). The Office Action cites the digital camera of Chuang for allegedly teaching this element. Applicants respectfully disagree.

In Figs. 2 and 3 of Chuang, the image input module 52 connects to a socket 38 located on a corner edge of the PDA 30. Chuang expressly states that the socket is “installed at one of the four corner of the housing” (see Chuang at column 3, lines 3-4). The peripheral module “includes an edge connector” for connecting to the socket (see Chuang at column 3, lines 12-13). By contrast, claim 35 recites a camera that is “enclosed within the internal device bay.”

For at least these reasons, independent claim 35 and its dependent claims are allowable over Kikinis in view of Bell and Chuang.

As another example, claim 35 recites that the camera has a first set of functions when inserted into the internal device bay and a second set of functions when removed from the bay. The claim further recites that the second set of functions includes capturing image content through the camera lens. Nowhere does Chuang teach or even suggest that the image input module 52 functions as a camera when removed from the PDA.

For at least these reasons, independent claim 35 and its dependent claims are allowable over Kikinis in view of Bell and Chuang.

### **V. Claims Rejection: 35 USC § 103(a)**

Claims 39, 40, 42, 43-49, and 51 are rejected under 35 USC § 103(a) as being unpatentable over Bell in view of Chuang. For at least the following reasons, these rejections are traversed.

### **Claim 39**

Independent claim 39 recites numerous recitations that are not taught or suggested in Bell in view of Chuang. As one example, claim 39 recites “a video device insertable in and **partially fully enclosed within** the internal device bay” of a computer (emphasis

added). The Office Action cites the digital camera of Chuang for allegedly teaching this element. Applicants respectfully disagree.

In Figs. 2 and 3 of Chuang, the image input module 52 connects to a socket 38 located on a corner edge of the PDA 30. Chuang expressly states that the socket is “installed at one of the four corner of the housing” (see Chuang at column 3, lines 3-4). The peripheral module “includes an edge connector” for connecting to the socket (see Chuang at column 3, lines 12-13). By contrast, claim 39 recites a video device that is “enclosed within the internal device bay.”

For at least these reasons, independent claim 39 and its dependent claims are allowable over Bell in view of Chuang.

As another example, claim 39 recites that the video device has a first set of functions when inserted into the internal device bay and a second set of functions when removed from the bay. The claim further recites that the second set of functions includes playing video content through the display screen of the video device. Nowhere does Chuang teach or even suggest that the image input module 52 functions as a video device when removed from the PDA.

For at least these reasons, independent claim 39 and its dependent claims are allowable over Bell in view of Chuang.

#### **Claim 42**

Independent claim 42 recites numerous recitations that are not taught or suggested in Bell in view of Chuang. As one example, claim 42 recites “a video capture device insertable in and **partially fully enclosed within** the internal device bay” of a computer (emphasis added). The Office Action cites the digital camera of Chuang for allegedly teaching this element. Applicants respectfully disagree.

In Figs. 2 and 3 of Chuang, the image input module 52 connects to a socket 38 located on a corner edge of the PDA 30. Chuang expressly states that the socket is “installed at one of the four corner of the housing” (see Chuang at column 3, lines 3-4). The peripheral module “includes an edge connector” for connecting to the socket (see Chuang at column 3, lines 12-13). By contrast, claim 42 recites a video capture device that is “enclosed within the internal device bay.”

For at least these reasons, independent claim 42 is allowable over Bell in view of Chuang.

As another example, claim 42 recites that the video capture device has a first set of functions when inserted into the internal device bay and a second set of functions when removed from the bay. The claim further recites that the second set of functions includes playing video content through the display of the video capture device. Nowhere does Chuang teach or even suggest that the image input module 52 functions as a video capture device when removed from the PDA.

For at least these reasons, independent claim 42 is allowable over Bell in view of Chuang.

### **Claim 43**

Independent claim 43 recites numerous recitations that are not taught or suggested in Bell in view of Chuang. As one example, claim 43 recites a camera having “a body insertable at least partially into and **partially fully enclosed within** the internal device bay of the personal electronic system” (emphasis added). The Office Action cites the digital camera of Chuang for allegedly teaching this element. Applicants respectfully disagree.

In Figs. 2 and 3 of Chuang, the image input module 52 connects to a socket 38 located on a corner edge of the PDA 30. Chuang expressly states that the socket is “installed at one of the four corner of the housing” (see Chuang at column 3, lines 3-4). The peripheral module “includes an edge connector” for connecting to the socket (see Chuang at column 3, lines 12-13). By contrast, claim 43 recites a camera that is “enclosed within the internal device bay.”

For at least these reasons, independent claim 43 and its dependent claims are allowable over Bell in view of Chuang.

As another example, claim 43 recites that the camera has a first set of functions when inserted into the internal device bay and a second set of functions when removed from the bay. The claim further recites that the second set of functions includes capturing image content through the camera lens. Nowhere does Chuang teach or even suggest that the image input module 52 functions as a camera when removed from the PDA.

For at least these reasons, independent claim 43 and its dependent claims are allowable over Bell in view of Chuang.

#### **Claim 47**

Independent claim 47 recites numerous recitations that are not taught or suggested in Bell in view of Chuang. As one example, claim 47 recites a video device having “a body insertable at least partially into and **partially fully enclosed within** the internal device bay” of a personal electronic system (emphasis added). The Office Action cites the digital camera of Chuang for allegedly teaching this element. Applicants respectfully disagree.

In Figs. 2 and 3 of Chuang, the image input module 52 connects to a socket 38 located on a corner edge of the PDA 30. Chuang expressly states that the socket is “installed at one of the four corner of the housing” (see Chuang at column 3, lines 3-4). The peripheral module “includes an edge connector” for connecting to the socket (see Chuang at column 3, lines 12-13). By contrast, claim 47 recites a video device that is “enclosed within the internal device bay.”

For at least these reasons, independent claim 47 and its dependent claims are allowable over Bell in view of Chuang.

As another example, claim 47 recites that the video device has a first set of functions when inserted into the internal device bay and a second set of functions when removed from the bay. The claim further recites that the second set of functions includes playing video content through the display of the video device. Nowhere does Chuang teach or even suggest that the image input module 52 functions as a video device when removed from the PDA.

For at least these reasons, independent claim 47 and its dependent claims are allowable over Bell in view of Chuang.

#### **Claim 51**

Claim 51 is canceled without prejudice or disclaimer. Applicants reserve the right to prosecute this claim in a continuing application and do not dedicate the subject matter of this claim to the public.





**VI. Claims Rejection: 35 USC § 103(a)**

Claims 41 and 50 are rejected under 35 USC § 103(a) as being unpatentable over Bell in view of Chuang and USPN 5,740,012 (Choi). Claim 41 depends from independent claim 39, and claim 50 depends from independent claim 47. As noted above, Bell and Chuang fail to teach or suggest all the elements in independent claims 39 and 47. Choi fails to cure these deficiencies. For at least the reasons, dependent claims 41 and 50 are allowable over Bell in view of Chuang and Choi.

### **CONCLUSION**

In view of the above, Applicants believe that all pending claims are in condition for allowance. Allowance of these claims is respectfully requested.

Any inquiry regarding this Amendment and Response should be directed to Philip S. Lyren at Telephone No. 832-236-5529. In addition, all correspondence should continue to be directed to the following address:

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Respectfully submitted,

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